

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA )

vs. )

PATRICIA DERGES, )

Defendant )

Cause No.: 6:21-cr-03016-BCW-1

**MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL**

COMES NOW Defendant, by and through his counsel of record, and respectfully requests leave of Court to file under seal Exhibits A and B to Defendant's Motion to Dismiss Superseding Indictment for Prejudicially Compromising 6<sup>th</sup> Amendment Rights of Defendant to Speedy Trial. Given that the motion addresses the sealed filing, the request to file under seal Exhibits A and B is necessary to ensure the privacy of the information exhibited in Exhibits A and B.

WHEREFORE, Defendant prays this Honorable Court grant permission to Defendant's counsel to file under seal Exhibits A and B to the Defendant's Motion to Dismiss Superseding Indictment for Prejudicially Compromising 6<sup>th</sup> Amendment Rights of Defendant to Speedy Trial.

Respectfully Submitted,

KODNER WATKINS

By: /s/ Albert S. Watkins

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### **CERTIFICATE OF SERVICE**

Signature above is also certification that on August 31, 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court utilizing the CM/ECF system which will send notification of such filing to all parties of record.